

-11-

REMARKS

In response to the Office Action mailed on August 3, 2007, Applicants respectfully request reconsideration. Claims 1-11, 19-29 and 37-42 are now pending in this Application. Claims 1, 19, 37 and 38 are independent claims and the remaining claims are dependent claims. Claims 1-11, 19-29 and 37-42 have been rejected.

In line item 11 of the current Office Action, Examiner asserts that Applicants, according to remarks filed on July 9, 2007, have admitted that detecting a change in root level domains between initial requests and former requests was known in the art to one of ordinary skill. Applicants seek to clarify that it was argued that one would merely recognize that the two internet addresses of "ssc.com" and "ics.com" are different root level domains, not that the detecting of root level domain changes between requests is well known in the art.

To further prosecution of this Application, Applicants submit the following remarks discussing the patentability of the rejected claims. Applicants believe that the claims as presented are in condition for allowance. A notice to this affect is respectfully requested.

Rejection of Originally Submitted Claims under 35 U.S.C. §103(a)

Claims 1-11, 19-29, 37 and 38 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Blumenau (US Pat No. 6,505,240) in view of Merriman et al. (US Pat. No. 5,948,061) and further in view of Lindbo et al., (US Pat No. 6,581,090) (hereinafter Lindbo). In addition, dependent claims 39-42, stand rejected under 35 U.S.C. §103(a) as being unpatentable over Blumenau in view of Merriman, Lindbo, and further in view of Subramaniam et al. (US Pat No. 6,081,900) (hereinafter Subramaniam).

Claim 1 includes distinguishing limitations over the cited references. In particular, claim 1 recites in **response to intercepting the initial request: creating redirection information indicating an identity of secondary content to be accessed by the requesting device in addition to the initial content in the initial**

**request.** None of the cited references, individually or in combination, teach or suggest all of these claim limitations.

Examiner asserts that such **intercepting** is taught in Blumenau, for example, in line items 10 and 12 of the current Office Action. As discussed in Applicants' Request for Continued Examination dated July 9, 2007, Blumenau is silent as to the **intercepting** limitations. Again, Applicants submit that it is understood that **intercepting** clearly means to interrupt the course, progress, or transmission to an intended destination. Receiving Blumenau's content request at a content providing site is not Applicants' **intercepting** because the content providing site is the intended destination. (See Col. 4, Lines 9-14) Even though Blumenau teaches that identifying content and a proxy content site can be performed at any network site other than the primary content site, it does not suggest that the network site is not an intended destination. (See Col. 11, Lines 65-67, Col. 12, Lines 1-2) Rather, the network site is an intended destination because parameters for making content and proxy site identifications are being transmitted to the network site. (See Col. 12, Lines 32-37) If the network site were actually **intercepting** the content requests, such requests would not seek to ensure that appropriate parameters were being transmitted to that network site (i.e. the intended destination) at which content and proxy content site identifications are made. (*Id.*) Since **intercepting** content requests is not taught or suggested in Blumenau, it logically follows that Blumenau does not **create redirection information indicating an identity of secondary content in response to intercepting the initial request** (where Examiner seeks to equate Blumenau's handoff instructions to Applicants' redirection information).

Instead of **intercepting** an initial request for content, Merriman is directed towards allowing for the uninterrupted transmission of a request between a browser and a website to result in a message that provides the browser with a link to an advertisement that does not reside at the website. (See Col. 3, Lines 24-63) As with Blumenau, Merriman's website is an intended destination. Thus, Merriman does not

**create redirection information indicating an identity of secondary content in response to intercepting the initial request.**

Lindbo teaches intercepting an information request directed to a content provider. (See Abstract) Lindbo's interceptor examines the information request to decide whether the same information exists in a copied form on a server arranged locally with respect to the interceptor. (See Col 2, Lines 44-49) If a copy of the requested information provided by the Internet content provider is stored at a local server, the request is re-routed to the server. (See Col 6, Lines 29-33) However, if the local server can only provide a copy of a portion of the requested information, the request can be passed on to the original content provider to retrieve the "uncopied" part. (See Col 6, Lines 46-55) Thus, Lindbo's interceptor seeks to locate alternative addresses for copies of information sought by information requests, the essential feature being that accessing a local server is quicker, easier, more cost efficient and, thereby, more preferable than accessing the original content provider. (See Col. 3, Lines 23-30 & Col. 2, Lines 59-62)

Since the locally stored copies are the same as the information residing at the originally sought content providers, Lindbo's interceptor is not identifying **secondary content**. In other words, while Lindbo finds local copies of the initial content, it does not **create redirection information indicating an identity of secondary content in response to intercepting the initial request**. Additionally, utilizing Lindbo's interceptor to intercept a Blumenau content request would prevent Blumenau's network site from identifying content and proxy content sites because the interceptor would effectuate transmission of a local copy of the initial content without Blumenau's secondary content and Blumenau's network site would never receive the content request in order to create handoff instructions.

For the reasons stated above, Applicants submit that neither Blumenau, Lindbo nor Merriman, alone or in combination, teach or suggest claim 1. Accordingly, the rejections under 35 U.S.C. §103(a) should be withdrawn as to claim 1 and all respective dependent claims. If the rejection is to be maintained, Applicants request that it be

-14-

pointed out with particularity where the cited references disclose or suggest all of the claim limitations as disputed above.

Applicants respectfully submit that independent claims 19, 37 and 38 include similar patentable distinctions over the cited references as claim 1. Thus, Applicants respectfully request allowance of dependent claims 19, 37 and 38 as well as all respective dependent claims.

Applicant(s) hereby petition(s) for any extension of time which is required to maintain the pendency of this case. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 50-3735.

If the enclosed papers or fees are considered incomplete, the Patent Office is respectfully requested to contact the undersigned collect at (508) 616-9660, in Westborough, Massachusetts.

Respectfully submitted,

/DWR/

David W. Rouille, Esq.  
Attorney for Applicants  
Registration No.: 40,150  
Chapin Intellectual Property Law, LLC  
Westborough Office Park  
1700 West Park Drive  
Westborough, Massachusetts 01581  
Telephone: (508) 616-9660  
Facsimile: (508) 616-9661

Attorney Docket No.: CIS01-05(3847)

Dated: August 16, 2007